

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
GE HFS HOLDINGS, INC.,	)	
<i>formerly known as</i>	)	
	)	
HELLER HEALTHCARE FINANCE, INC.,	)	
	)	
Plaintiff,	)	
and	)	
	)	
MICHAEL INGOLDSBY,	)	
	)	Civil Action No. 05-CV-11128 NG
Intervenor Plaintiff,	)	
v.	)	
	)	
NATIONAL UNION FIRE INSURANCE	)	
COMPANY OF PITTSBURGH, PA. and	)	
INTERNATIONAL INSURANCE GROUP, LTD.	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION TO CONTINUE STATUS CONFERENCE AND TO EXTEND  
DISCOVERY DEADLINE**

Plaintiff GE HFS Holdings, Inc., formerly known as Heller Healthcare Finance, Inc. (“Heller”), intervenor-plaintiff Michael Ingoldsby (“Ingoldsby”), defendant National Union Fire Insurance Company of Pittsburgh, PA (“National Union”) and intervenor-defendant International Insurance Group, LTD (“International” and collectively with Heller, Ingoldsby and National Union, the “Parties”), by their undersigned counsel, hereby respectfully requests that the Court:

(i) continue the status conference, presently scheduled for March 14, 2006, until a date convenient for the Court, but not less than forty five (45) days from its present date; and (ii) extend the time for the taking of fact discovery from April 3, 2006 to June 30, 2006. In support hereof, the Parties state as follows:

1. On December 12, 2005, the Court permitted Michael Ingoldsby (“Ingoldsby”) to intervene in this matter and to add a new party to this action the intervener-defendant, International.

2. In light of the addition of new parties, claims and defenses to this matter, the Parties respectfully request that the time for taking fact discovery be extended from April 3, 2006 to June 30, 2006.

3. On February 21, 2006, the Court granted National Union’s assented to motion to continue the mediation in this matter to April 20, 2006 from March 9, 2006.

4. The Parties respectfully request that the status conference, which is presently scheduled for March 14, 2006, be continued for forty five (45) days to permit the Parties an opportunity to conduct the mediation prior to participating in the status conference.

WHEREFORE the Parties respectfully request that the Court continue the status conference presently scheduled for March 14, 2006 for not less than forty-five (45) days and that the Court extend the period for taking fact discovery from April 3, 2006 to June 30, 2006.

Respectfully submitted,

GE HFS HOLDINGS, INC.,  
formerly known as  
HELLER HEALTHCARE FINANCE, INC.

By its attorneys,

/s/ Jeffrey E. Francis  
Gayle P. Ehrlich (BBO # 546861)  
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Respectfully submitted,

NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA

By its attorneys,

/s/ Mary Patricia Cormier  
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Respectfully submitted,

MICHAEL INGOLDSBY,

By his attorney,

/s/ Gregory J. Aceto

Gregory J. Aceto, Esq. (BBO# 558556)

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Respectfully submitted,

INTERNATIONAL INSURANCE  
GROUP LTD

By its attorney,

/s/ Richard E. Heifetz

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March 1, 2006

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on March 1, 2006.

/s/ Jeffrey E. Francis